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BY ECF

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Luis Espinal*
Case No. 19-CR-821 (KMW)

MEMO ENDORSED

Dear Judge Wood:

We write on behalf of our client, Luis Espinal, to respectfully request an adjournment of the status conference scheduled for August 10, 2022 of approximately 30 days. As we previously advised the Court, we have requested a meeting with the deferred prosecution committee at the U.S. Attorney's Office in furtherance of potential plea negotiations. Because of overlapping scheduling conflicts, that meeting has not yet occurred, but we expect it will occur within the next week. Whatever the outcome of that meeting, however, plea negotiations may continue beyond it, and therefore additional time is needed to see whether the parties can reach a resolution short of trial. We have discussed the proposed adjournment of the status conference with AUSA Jim Ligtenberg and he has advised that the government has no objection.

Granted
KMW

We appreciate the Court's consideration.

Respectfully submitted,

/s/

Justine A. Harris
Noam Biale
SHER TREMONTE LLP

Attorneys for Luis Espinal

cc: All counsel (via ECF)

The status conference is adjourned
to September 9, 2022 at 11 AM.

SO ORDERED, N.Y., N.Y.

8/3/2022
Kimba M. Wood
KIMBA M. WOOD
U.S.D.J.